

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

JAMIE WEATHERFORD and KIMBERLY
WEATHERFORD, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

E.I. DUPONT DE NEMOURS & COMPANY,
THE CHEMOURS COMPANY, FC, LLC, 3M
COMPANY, DAIKIN AMERICA, INC., and
MITSUBISHI INTERNATIONAL
POLYMERTRADE CORPORATION,

Defendants.

Case No. 4:22-cv-01427-JDA

**JOINT MOTION TO ENTER
SECOND AMENDED
SCHEDULING ORDER**

E.I. DUPONT DE NEMOURS & COMPANY

Third-Party Plaintiff,

v.

HUNTSMAN INTERNATIONAL LLC, ITSELF
AND AS SUCCESSOR IN INTEREST TO CIBA
GEIGY CHEMICALS CORP.; AND/OR CIBA
SPECIALTY CHEMICALS, INC.; GALEY &
LORD INDUSTRIES, LLC; Galey & Lord, LLC,
NANOTEX LLC, AND JOHN DOES 1-50,

Third-Party Defendants.

THE CHEMOURS COMPANY,

Third-Party Plaintiff

v.

HUNTSMAN INTERNATIONAL LLC, ITSELF
AND AS SUCCESSOR IN INTEREST TO CIBA
GEIGY CHEMICALS CORP.; AND/OR CIBA
SPECIALTY CHEMICALS, INC.; GALES &
LORD INDUSTRIES, LLC; GALEY & LORD,
LLC; NANOTEX LLC, AND JOHN DOES 1-50,

Third-Party Defendants.)
)
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3M COMPANY,)
)
Third-Party Plaintiff)
)
v.)
)
GALEY & LORD, INC.; GALEY & LORD, LLC,)
GALEY & LORD INDUSTRIES, LLC; GALEY &)
LORD INDUSTRIES, INC.; JOHN DOE PLANT)
OWNERS/OPERATORS; NANOTEX, LLC;)
JOHN DOE SUPPLIERS; AND JOE DOE)
BIOSOLIDS ENTITIES,)
)
Third-Party Defendants.)
)
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DAIKIN AMERICA, INC.,)
)
Third-Party Plaintiff)
)
v.)
)
GALEY & LORD INDUSTRIES, INC. AND)
GALEY & LORD INDUSTRIES, LLC.)
)
Third-Party Defendants.)
)
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Pursuant to the Court’s Text Order issued at ECF No. 203, the parties, through their undersigned attorneys, jointly move the Court to enter the proposed Consent Second Amended Scheduling Order being submitted in connection with this Motion.

Through negotiation, and after considering the unique circumstances involved in this complex putative class action, the parties jointly determined that the proposed Consent Amended Scheduling Order provides a reasonable schedule for the remaining deadlines in this case. The parties are mindful that the Civil Justice Reform Act encourages District Judges to attempt to

complete cases within three years. However, it is not possible to complete some cases within three years, and the parties respectfully submit that, for several reasons, this is such a case.

As the Court is aware, the deadlines in this case have been stayed for the past nine months—from July 9, 2024, until April 2, 2025. Prior to this stay, the litigation of Defendants’ motions to dismiss lasted for more than a year. Further, immediately prior to the stay, additional parties were added to the case as Third-Party Defendants. In addition, this is a putative class action involving a high number of complex legal and factual issues, and the parties anticipate that the case will also involve a high number of fact and expert witnesses. Finally, because the parties agree that the proposed schedule is reasonable under these circumstances, no party will be prejudiced by this schedule.

WHEREFORE, the Parties respectfully request that the Court grant this joint motion to enter the proposed Consent Second Amended Scheduling Order.

[Signatures appear on the following page]

WE SO MOVE:

Defendants E.I. du Pont de Nemours & Company and The Chemours Company, FC, LLC

s/ Molly H. Craig

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s/ Robert H. Jordan

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